

KOHN, SWIFT & GRAF, P.C.

1600 MARKET STREET, SUITE 2500

PHILADELPHIA, PENNSYLVANIA 19103-7225

JOSEPH C. KOHN
ROBERT A. SWIFT
ROBERT J. LAROGGA †
DOUGLAS A. ABRAHAMS
WILLIAM E. HOESE
ZAHRA R. DEAN †
ELIAS A. KOHN

(215) 238-1700

TELECOPIER (215) 238-1968

FIRM E-MAIL: info@kohnswift.com

WEB SITE: www.kohnswift.com

HAROLD E. KOHN
1914-1999
BAYARD M. GRAF
1926-2015

OF COUNSEL
GEORGE W. CRONER
CARY FLEISHER
LISA PALFY KOHN

† ALSO ADMITTED IN NEW YORK
‡ ONLY ADMITTED IN NEW YORK

Senders E-mail: rswift@kohnswift.com

May 19, 2025

Honorable Eric R. Komitee
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Courtroom: 6G North
Brooklyn, New York 11201

RE: *Edmondson, et al. v Raniere, et al.* Case No.: 1:20-cv-00485-EK-CLP

Dear Judge Komitee:

I am counsel for the Plaintiffs in this action and write to request that your Honor enter an Order directing Ronald S. Sullivan, Jr., former counsel for Defendant Clare Bronfman, to turn over his files to Aaron Goldsmith, her new counsel. Today, after an agreed adjournment, counsel are required to make their initial disclosures. Mr. Goldsmith is unable to do so because Mr. Sullivan has not forwarded him Clare Bronfman's files.

On April 17, 2025, a Notice of Substitution of Counsel was filed substituting, as counsel for Clare Bronfman, Mr. Goldsmith for Mr. Sullivan. ECF # 288. On April 30, and again on May 14, Mr. Goldsmith advised Plaintiffs that he was still waiting to receive files from Mr. Sullivan. Since this Court has not yet approved Mr. Sullivan's withdrawal as counsel, it is appropriate for this Court to direct him to turn over his files to allow new counsel to comply with the discovery Order.

On May 15, I notified all counsel of my intent to make this request absent a turnover of documents by Mr. Sullivan.

Respectfully yours,



Robert A. Swift

Cc via e-mail: All Counsel
Ms. Danielle Roberts